

Message

From: Taylor, Kevin [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=C9483DA991924F4D9BC80D5624B14799-TAYLOR, KEVIN]
Sent: 9/23/2020 5:23:24 PM
To: Warrilow, Phyllis [Warrilow.Phyllis@epa.gov]
CC: Groendyke, Todd [Groendyke.Todd@epa.gov]
BCC: Kevin Taylor [Taylor.Kevin@epa.gov]
Subject: RE: Draft FGT Section 114 Information Request
Attachments: Kinder Morgan - Florida Gas Transmission.pdf; Note to File Janice Taylor Call 08042020.pdf; 1-0070012-020-AV Final-Revision.pdf; FGT Brooker.pdf

Phyllis,
This is some additional information for the event and the facility.

Sincerely,

Kevin J. Taylor

Environmental Engineer | Air Enforcement Branch (AEB)
Enforcement And Compliance Assurance Division (ECAD)
U.S. Environmental Protection Agency | Region 4
61 Forsyth Street, S.W. | Atlanta, GA 30303
(404) 562-9134 | taylor.kevin@epa.gov

From: Groendyke, Todd <Groendyke.Todd@epa.gov>
Sent: Wednesday, September 23, 2020 11:22 AM
To: Warrilow, Phyllis <Warrilow.Phyllis@epa.gov>
Cc: Taylor, Kevin <Taylor.Kevin@epa.gov>
Subject: FW: Draft FGT Section 114 Information Request

Hi Phyllis:

Please see the attached 114 that Kevin prepared for the FGT Brooker methane gas release. Could you review this letter from a GDC perspective and coordinate with Kevin if you think anything should be added to this letter.

Sincerely,

Todd Groendyke
Chief, Air Section 2
Air Enforcement Branch
Enforcement and Compliance Assurance Division
U.S. EPA Region 4
Tel: (404) 562-8262

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From: Taylor, Kevin <Taylor.Kevin@epa.gov>
Sent: Wednesday, September 23, 2020 11:16 AM
To: Groendyke, Todd <Groendyke.Todd@epa.gov>
Subject: Draft FGT Section 114 Information Request

Todd,

Attached is a draft Sec. 114 for the FGT Brooker facility. Let me know if I am on the right track with the information requested and if you have any additional suggestions. Also, the following is from the Kinder Morgan website describing the structure of FGT:

Florida Gas Transmission

The Florida Gas Transmission (FGT) pipeline is an approximately 5,300-mile system that transports natural gas from south Texas to south Florida.

FGT is owned by Florida Gas Transmission Company, LLC, a 100 percent owned subsidiary of Citrus Corp. Citrus Corp is a 50/50 joint venture

between Kinder Morgan, Inc. (NYSE: KMI) and Energy Transfer.

FGT is the permitted entity for the facility.

Additionally, the permit contains the following provisions:

Excess Emissions

Rule 62-210.700 (Excess Emissions), F.A.C. cannot vary any requirement of an NSPS, NESHAP or Acid Rain program provision.

A.5. Excess Emissions Allowed. Excess emissions resulting from startup or shutdown of any emissions unit shall be permitted provided (1) best operational practices to minimize emissions are adhered to and (2) the duration of excess emissions shall be minimized but in no case exceed two hours in any 24-hour period unless specifically authorized by the Department for longer duration. [Rule 62-210.700(1), F.A.C.]

A.6. Excess Emissions Prohibited. Excess emissions that are caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure that may reasonably be prevented during any startup, shutdown or malfunction shall be prohibited. [Rule 62-210.700(1), F.A.C.]

Sincerely,

Kevin J. Taylor

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